

**IN THE UNITED STATE DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

<b>ALISON O'DONNELL,</b>	)	CASE NO. 1:16-CV-02480-DCN
	)	
Plaintiff,	)	JUDGE DONALD C. NUGENT
	)	
v.	)	
	)	
<b>UNIVERSITY HOSPITALS HEALTH</b>	)	
<b>SYSTEM, <i>et al.</i>,</b>	)	
	)	
Defendants.	)	

**CONSENT MOTION TO EXTEND DEADLINE TO  
ANSWER PLAINTIFF'S COMPLAINT**

On October 10, 2016, Plaintiff Alison O'Donnell ("Plaintiff") commenced an action against Defendants University Hospitals Health System, Inc. ("UHHS"), Naveen Uli ("Uli"), Sumana Narasimhan ("Narasimhan"), and Rose Gubitosi-Klug ("Gubitosi-Klug") (collectively, "Defendants"). On November 28, 2016, UHHS was served with a summons and a copy of the Complaint. Accordingly, UHHS' current deadline to answer or otherwise respond to Plaintiff's Complaint is Monday, December 19, 2016.

Upon information and belief, none of the remaining Defendants have been served with summonses or copies of the Complaint. On December 16, 2016, the remaining Defendants agreed to waive the service of the summonses. Thus, Uli, Narasimhan, and Gubitosi-Klug now have until February 14, 2017, to answer or otherwise respond to Plaintiff's Complaint.

The undersigned counsel for Defendants is beginning its review of Plaintiff's Complaint and needs additional time to conduct its investigation. Accordingly, UHHS respectfully requests a 21-day extension of time, through and including January 9, 2017, to answer or otherwise respond to Plaintiff's Complaint. Additionally, Defendants request that this Court postpone the case management conference currently scheduled for January 5, 2017, and reschedule the

conference for a date and time after January 9, 2017 (or after all Defendants have responded to the Complaint).<sup>1</sup>

Defendants affirm that the requested extension is not for purposes of undue delay. Plaintiff's counsel has been consulted regarding these requests and has consented to both requests.

WHEREFORE, Defendants respectfully request that the deadline for UHHS to answer, move, or otherwise respond to the Complaint be extended until and through January 9, 2017, and that the case management conference scheduled for January 5, 2017, be postponed until after all the Defendants have responded to the Complaint.

Respectfully submitted,

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*Attorneys for Defendants*

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<sup>1</sup> The undersigned counsel currently intends to respond to the Complaint on behalf of all Defendants on or before January 9, 2017.

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on this 16th day of December, 2016, a copy of the foregoing was filed electronically. Notice of this filing will be sent to all parties, when applicable, by operation of the Court's ECF system. Parties may access this filing through the Court's electronic filing system. If parties will not receive notice via the Court's electronic filing system, a true and correct copy of the foregoing will be served via regular United States Mail, postage prepaid, upon the following:

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*Attorney for Plaintiff*

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